

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
NORTHERN DIVISION**

**SHAWANNA NELSON**

**PLAINTIFF**

**VS.**

**NO. 1:04CV00037**

**CORRECTIONAL MEDICAL SERVICES et al**

**DEFENDANTS**

**PLAINTIFF'S RESPONSE TO CMS' MOTION FOR SUMMARY JUDGMENT**

Comes the Plaintiff, Shawanna Nelson, by and through her lawyer, Cathleen V. Compton and for her Response to CMS's Motion to for Summary Judgment, states:

1. The legal standard set forth in Paragraph one is correct and so admitted. It is denied that CMS is entitled to Summary Judgment in that there exist issues of material fact.
2. The exhibits stated in Paragraph two of the Motion are in fact attached to the Motion.
3. Paragraph three is denied.

The Motion is not well taken and should be denied.

Respectfully submitted,

*/s/ Cathleen Compton*  
Cathleen V. Compton, # 85031  
114 South Pulaski  
Little Rock, AR 72201  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing pleading has been mailed electronically this 4<sup>th</sup> day of January, 2007 to Alan Humphries, Humphries & Lewis, P.O. Box 9068, Pine Bluff, AR 71611, and Christine Cryer Boozer, Assistant Attorney General, 323 Center Street, Suite 1100, Little Rock, AR., 72201.

*/s/ Cathleen Compton*  
Cathleen V. Compton